

LAW OFFICES
LAZZARO LAW FIRM, P.C.

360 COURT STREET
SUITE 3
BROOKLYN, NEW YORK 11231

TELEPHONE: (718) 488-1900
TELECOPIER: (718) 488-1927
EMAIL: LAZZAROLAW@AOL.COM

LANCE LAZZARO
RANDALL LAZZARO *

* ADMITTED IN NY & NJ

JAMES KILDUFF *
JAMES KIRSHNER
ROGER GREENBERG

April 23, 2020

Honorable Paul A. Engelmayer
United States District Court Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Daniel Hernandez
Docket No.: S5 18-CR-0834-004 (PAE)
Request to Expand Home Confinement to Backyard

Dear Judge Engelmayer:

As you know, I represent Daniel Hernandez. Pursuant to your Honor's recent order, Mr. Hernandez was released from jail and he is now serving his sentence under home confinement. Probation has approved his residence of [REDACTED], and he is in full compliance.

I am writing today only to request the Court's approval to permit Mr. Hernandez to spend up to two hours in his backyard, once a week, for employment purposes only. He is looking to record music videos in his backyard. Probation is aware and has no objection to this request.

Thank you for your attention herein. Please contact me if you have any questions or need any additional information. I am seeking to file this letter under seal in order to prevent the public disclosure of Mr. Hernandez's home address.

Very Truly Yours,

LAZZARO LAW FIRM, P.C.

BY: /s/
LANCE LAZZARO

cc.: USPO Adam Pakula, via e-mail: adam_pakula@nysp.uscourts.gov
USPO David Mulcahy, via e-mail: david_mulcahy@nysp.uscourts.gov
AUSA Michael Longyear, via e-mail: michael.longyear@usdoj.gov